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November 22, 2023

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**Via ECF**

Judge Jil Mazer-Marino  
U.S. Bankruptcy Court, EDNY  
Conrad B. Duberstein Courthouse  
271-C Cadman Plaza East - Suite 1595  
Brooklyn, NY 11201-1800

RE: In re Carl Mongru; Docket No. 1-23-44014

Dear Hon. Judge Mazer-Marino:

We are counsel for Creditor, Millennium Trust Company, LLC as Custodian FBO Prime Meridian NPL, LLC (“Secured Creditor”). We respectfully request that this case be reassigned to the Hon. Nancy Hershey Lord because she is familiar with a series of cases to which this one is related.

**The Instant Bankruptcy Action**

On November 1, 2023, allegedly unbeknownst to Carl Mongru (“Debtor”), an individual filed a bankruptcy petition in Debtor’s name to stop a foreclosure auction, scheduled for November 2, 2023, of a property known as 703 Pine Street, Brooklyn, New York 11208 (the “Property”).

Debtor transferred the Property to G&Q Estates, Corp., (“G&Q”) in 2008. While Debtor has remained in default in the Foreclosure Action, G&Q has been actively litigating the action since 2016. Debtor allegedly has no knowledge of the filing and did not file the instant petition. *See*, Declaration of Carl Mongru submitted herewith.

Upon information and belief, David Cohan a/k/a David Cohen a/k/a Eli Cohan a/k/a Ilan David Avitsedek is the sole shareholder of G&Q.

**Judge Lord is Presiding Over Several Related Actions**

Judge Lord has presided over several related actions regarding a property located at 230 Tompkins Avenue in Brooklyn (“230 Tompkins”), a property previously owned by an entity of Ilan David Avitsedek a/k/a David Cohan a/k/a David Cohen a/k/a Eli Cohan (“Ilan Avitsedek”). These actions were filed to hinder Creditor from

proceeding with its foreclosure auction of 230 Tompkins pursuant to a Judgment of Foreclosure and Sale issued by the Supreme Court for the State of New York, County of Kings.

The first bankruptcy action was filed by a prior owner of 230 Tompkins, A&Q Estates, Inc. (“A&Q”), bearing Docket No. 17-44961. A&Q allegedly purchased 230 Tompkins from the borrower on the underlying mortgage, Wilberforce W. Gray (“Gray”). A&Q filed for Chapter 7 Bankruptcy on September 27, 2017, just one day before a foreclosure auction was scheduled. The case was dismissed on February 27, 2017 and closed on March 19, 2018. A&Q then sold 230 Tompkins to Northfield 30 Corp., (“Northfield”) for zero consideration.

Shortly thereafter, Northfield filed a Chapter 11 petition on May 15, 2018 under Docket No. 18-42802, two days before the rescheduled foreclosure auction. Judge Lord is presiding over a Rule 11 motion for sanctions filed by Creditor in Northfield’s bankruptcy action for the frivolous filing by the common sole shareholder of Northfield and A&Q. In that case, Judge Lord also issued an Order on January 4, 2019 granting Creditor *In-Rem Relief* from the Automatic Stay as to 230 Tompkins so Creditor could proceed with its auction. Currently, there is a motion pending to compel the Albany City Court Criminal Part (the “Criminal Court”) to release an unredacted copy of all documents filed in connection with a criminal case initiated by the State of New York under Docket Number 12-218773 against Ilan Avitsedek.

Furthermore, a third bankruptcy was filed in the Eastern District (1:19-bk-42865) in Gray’s name on May 8, 2019 to delay a foreclosure auction of 230 Tomkins which was scheduled for May 9, 2019. The case was closed on July 1, 2019.

The filing of the present petition is linked to the aforementioned actions to delay the sale of the Property because, upon information and belief, the sole shareholder of the entities that own these properties are the same. The commencement of the present action, unbeknownst to Carl Mongru, is an example of the fraudulent practices that Ilan Avitsedek has orchestrated regarding multiple distressed properties in Kings County.

We respectfully request that this case be transferred to Judge Lord so that the series of cases filed at the direction of or manipulated by Ilan Avitsedek be heard before the same justice.

Sincerely,

/s/ Mojdeh Malekan  
Mojdeh Malekan